

EXHIBIT A

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Counsel for Individual and Representative Plaintiffs and the Proposed Class

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

V.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF TA-NEHISI COATES'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS**

1 and any other applicable rules or laws. Plaintiff will interpret these instructions as not
 2 requiring Plaintiff to perform unreasonable searches, not requiring cumulative or
 3 duplicative discovery, and not requiring Plaintiff to exceed the obligations set forth in
 4 the applicable rules and laws.

5 14. In providing these responses and objections and in producing documents, Plaintiff does
 6 not waive any ground on which he may object to the use of any response, objection or document in
 7 subsequent proceedings.

8 15. Plaintiff's investigation in this Action is ongoing. Plaintiff therefore reserves the right to
 9 supplement these responses.

OBJECTIONS AND RESPONSES TO INDIVIDUAL REQUESTS

REQUEST FOR PRODUCTION NO. 1:

10 Complete copies of copyright registrations and deposit material for each of YOUR ASSERTED
 11 WORKS.

RESPONSE TO REQUEST NO. 1:

12 In addition to and without waiving the general objections set forth above, Plaintiff objects to
 13 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 14 Request to the extent that the term "deposit material" is undefined and ambiguous. Plaintiff further
 15 objects to this Request to the extent that it calls for documents subject to the attorney-client privilege,
 16 work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff
 17 objects to this Request on the grounds that such documents are publicly accessible, are equally
 18 available to Defendants, or are already in their possession, custody, or control.

19 Subject to and without waiving the general and specific objections stated above, Plaintiff will
 20 search for and produce relevant and responsive non-privileged copyright registrations within his
 21 possession, custody, or control relating to Plaintiff's ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 2:

22 All COMMUNICATIONS between YOU, on the one hand, and the other Plaintiffs or third
 23 parties, on the other hand, CONCERNING the ACTION, including but not limited to interviews,
 24 statements to the press, and discussions with other authors not a party to the ACTION.

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Counsel for Individual and Representative Plaintiffs and the Proposed Class

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

V.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF JUNOT DÍAZ'S RESPONSES
AND OBJECTIONS TO DEFENDANT
META PLATFORMS, INC.'S FIRST SET
OF REQUESTS FOR PRODUCTION OF
DOCUMENTS AND THINGS**

1 and any other applicable rules or laws. Plaintiff will interpret these instructions as not
 2 requiring Plaintiff to perform unreasonable searches, not requiring cumulative or
 3 duplicative discovery, and not requiring Plaintiff to exceed the obligations set forth in
 4 the applicable rules and laws.

5 14. In providing these responses and objections and in producing documents, Plaintiff does
 6 not waive any ground on which he may object to the use of any response, objection or document in
 7 subsequent proceedings.

8 15. Plaintiff's investigation in this Action is ongoing. Plaintiff therefore reserves the right to
 9 supplement these responses.

OBJECTIONS AND RESPONSES TO INDIVIDUAL REQUESTS

REQUEST FOR PRODUCTION NO. 1:

10 Complete copies of copyright registrations and deposit material for each of YOUR ASSERTED
 11 WORKS.

RESPONSE TO REQUEST NO. 1:

12 In addition to and without waiving the general objections set forth above, Plaintiff objects to
 13 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 14 Request to the extent that the term "deposit material" is undefined and ambiguous. Plaintiff further
 15 objects to this Request to the extent that it calls for documents subject to the attorney-client privilege,
 16 work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff
 17 objects to this Request on the grounds that such documents are publicly accessible, are equally
 18 available to Defendants, or are already in their possession, custody, or control.

19 Subject to and without waiving the general and specific objections stated above, Plaintiff will
 20 search for and produce relevant and responsive non-privileged copyright registrations within his
 21 possession, custody, or control relating to Plaintiff's ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 2:

22 All COMMUNICATIONS between YOU, on the one hand, and the other Plaintiffs or third
 23 parties, on the other hand, CONCERNING the ACTION, including but not limited to interviews,
 24 statements to the press, and discussions with other authors not a party to the ACTION.

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Counsel for Individual and Representative Plaintiffs and the Proposed Class

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

V.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Case No. 4:23-cv-06663

**PLAINTIFF CHRISTOPHER GOLDEN'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS,
INC.'S FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS**

1 those set forth in the Federal Rules of Civil Procedure, the Local Rules of this Court, and
 2 any other applicable rules or laws. Plaintiff will interpret these instructions as not
 3 requiring Plaintiff to perform unreasonable searches, not requiring cumulative or
 4 duplicative discovery, and not requiring Plaintiff to exceed the obligations set forth in the
 5 applicable rules and laws.

6 14. In providing these responses and objections and in producing documents, Plaintiff does
 7 not waive any ground on which he may object to the use of any response, objection or document in
 8 subsequent proceedings.

9 15. Plaintiff's investigation in this Action is ongoing. Plaintiff therefore reserves the right to
 10 supplement these responses.

OBJECTIONS AND RESPONSES TO INDIVIDUAL REQUESTS

REQUEST FOR PRODUCTION NO. 1:

12 Complete copies of copyright registrations and deposit material for each of YOUR ASSERTED
 13 WORKS.

RESPONSE TO REQUEST NO. 1:

15 In addition to and without waiving the general objections set forth above, Plaintiff objects to this
 16 Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 17 Request to the extent that the term "deposit material" is undefined and ambiguous. Plaintiff further
 18 objects to this Request to the extent that it calls for documents subject to the attorney-client privilege,
 19 work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff
 20 objects to this Request on the grounds that such documents are publicly accessible, are equally available
 21 to Defendant, or are already in their possession, custody, or control.

22 Subject to and without waiving the general and specific objections stated above, Plaintiff will
 23 search for and produce relevant and responsive non-privileged copyright registrations within his
 24 possession, custody, or control relating to Plaintiff's ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 2:

26 All COMMUNICATIONS between YOU, on the one hand, and the other Plaintiffs or third
 27 parties, on the other hand, CONCERNING the ACTION, including but not limited to interviews,
 28 statements to the press, and discussions with other authors not a party to the ACTION.

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Counsel for Individual and Representative Plaintiffs and the Proposed Class

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

V.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF ANDREW SEAN GREER'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS**

1 and any other applicable rules or laws. Plaintiff will interpret these instructions as not
 2 requiring Plaintiff to perform unreasonable searches, not requiring cumulative or
 3 duplicative discovery, and not requiring Plaintiff to exceed the obligations set forth in
 4 the applicable rules and laws.

5 14. In providing these responses and objections and in producing documents, Plaintiff does
 6 not waive any ground on which he may object to the use of any response, objection or document in
 7 subsequent proceedings.

8 15. Plaintiff's investigation in this Action is ongoing. Plaintiff therefore reserves the right to
 9 supplement these responses.

OBJECTIONS AND RESPONSES TO INDIVIDUAL REQUESTS

REQUEST FOR PRODUCTION NO. 1:

10 Complete copies of copyright registrations and deposit material for each of YOUR ASSERTED
 11 WORKS.

RESPONSE TO REQUEST NO. 1:

12 In addition to and without waiving the general objections set forth above, Plaintiff objects to
 13 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 14 Request to the extent that the term "deposit material" is undefined and ambiguous. Plaintiff further
 15 objects to this Request to the extent that it calls for documents subject to the attorney-client privilege,
 16 work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff
 17 objects to this Request on the grounds that such documents are publicly accessible, are equally
 18 available to Defendants, or are already in their possession, custody, or control.

19 Subject to and without waiving the general and specific objections stated above, Plaintiff will
 20 search for and produce relevant and responsive non-privileged copyright registrations within his
 21 possession, custody, or control relating to Plaintiff's ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 2:

22 All COMMUNICATIONS between YOU, on the one hand, and the other Plaintiffs or third
 23 parties, on the other hand, CONCERNING the ACTION, including but not limited to interviews,
 24 statements to the press, and discussions with other authors not a party to the ACTION.

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Counsel for Individual and Representative Plaintiffs and the Proposed Class

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

V.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF DAVID HENRY HWANG'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS**

1 and any other applicable rules or laws. Plaintiff will interpret these instructions as not
 2 requiring Plaintiff to perform unreasonable searches, not requiring cumulative or
 3 duplicative discovery, and not requiring Plaintiff to exceed the obligations set forth in
 4 the applicable rules and laws.

5 14. In providing these responses and objections and in producing documents, Plaintiff does
 6 not waive any ground on which he may object to the use of any response, objection or document in
 7 subsequent proceedings.

8 15. Plaintiff's investigation in this Action is ongoing. Plaintiff therefore reserves the right to
 9 supplement these responses.

OBJECTIONS AND RESPONSES TO INDIVIDUAL REQUESTS

REQUEST FOR PRODUCTION NO. 1:

10 Complete copies of copyright registrations and deposit material for each of YOUR ASSERTED
 11 WORKS.

RESPONSE TO REQUEST NO. 1:

12 In addition to and without waiving the general objections set forth above, Plaintiff objects to
 13 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 14 Request to the extent that the term "deposit material" is undefined and ambiguous. Plaintiff further
 15 objects to this Request to the extent that it calls for documents subject to the attorney-client privilege,
 16 work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff
 17 objects to this Request on the grounds that such documents are publicly accessible, are equally
 18 available to Defendants, or are already in their possession, custody, or control.

19 Subject to and without waiving the general and specific objections stated above, Plaintiff will
 20 search for and produce relevant and responsive non-privileged copyright registrations within his
 21 possession, custody, or control relating to Plaintiff's ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 2:

22 All COMMUNICATIONS between YOU, on the one hand, and the other Plaintiffs or third
 23 parties, on the other hand, CONCERNING the ACTION, including but not limited to interviews,
 24 statements to the press, and discussions with other authors not a party to the ACTION.

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Counsel for Individual and Representative Plaintiffs and the Proposed Class

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

V.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Case No. 4:23-cv-06663

PLAINTIFF RICHARD KADREY'S RESPONSES AND OBJECTIONS TO DEFENDANT META PLATFORMS, INC.'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS

1 duplicative discovery, and not requiring Plaintiff to exceed the obligations set forth in the
2 applicable rules and laws.

- 3 14. In providing these responses and objections and in producing documents, Plaintiff does not
4 waive any ground on which he may object to the use of any response, objection or document in
5 subsequent proceedings.
6 15. Plaintiff's investigation in this Action is ongoing. Plaintiff therefore reserves the right to
7 supplement these responses.

8 **OBJECTIONS AND RESPONSES TO INDIVIDUAL REQUESTS**

9 **REQUEST FOR PRODUCTION NO. 1:**

10 Complete copies of copyright registrations and deposit material for each of YOUR ASSERTED
11 WORKS.

12 **RESPONSE TO REQUEST NO. 1:**

13 In addition to and without waiving the general objections set forth above, Plaintiff objects to this
14 Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
15 Request to the extent that the term "deposit material" is undefined and ambiguous. Plaintiff further
16 objects to this Request to the extent that it calls for documents subject to the attorney-client privilege,
17 work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff
18 objects to this Request on the grounds that such documents are publicly accessible, are equally available
19 to Defendant, or are already in their possession, custody, or control.

20 Subject to and without waiving the general and specific objections stated above, Plaintiff will
21 search for and produce relevant and responsive non-privileged copyright registrations within his
22 possession, custody, or control relating to Plaintiff's ASSERTED WORKS.

23 **REQUEST FOR PRODUCTION NO. 2:**

24 All COMMUNICATIONS between YOU, on the one hand, and the other Plaintiffs or third
25 parties, on the other hand, CONCERNING the ACTION, including but not limited to interviews,
26 statements to the press, and discussions with other authors not a party to the ACTION.

1 Joseph R. Saveri (State Bar No. 130064)
2 Cadio Zirpoli (State Bar No. 179108)
3 Christopher K.L. Young (State Bar No. 318371)
4 Travis Manfredi (State Bar No. 281779)
Holden Benon (State Bar No. 325847)
Kathleen J. McMahon (State Bar No. 340007)
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5 **JOSEPH SAVERI LAW FIRM, LLP**

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11 *Counsel for Individual and Representative
12 Plaintiffs and the Proposed Class*

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13

14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO DIVISION**

17 Richard Kadrey, et al.,

18 *Individual and Representative Plaintiffs,*

19 v.

20 Meta Platforms, Inc.,

21 *Defendant.*

Lead Case No. 3:23-cv-03417-VC

PLAINTIFF MATTHEW KLAM'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS

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Lead Case No. 3:23-cv-03417-VC

PLAINTIFF MATTHEW KLAM'S RESPONSES AND OBJECTIONS TO DEFENDANT META PLATFORMS, INC.'S
FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS

1 14. In providing these responses and objections and in producing documents, Plaintiff does not
2 waive any ground on which he may object to the use of any response, objection or document in
3 subsequent proceedings.

4 15. Plaintiff's investigation in this Action is ongoing. Plaintiff therefore reserves the right to
5 supplement these responses.

6 **OBJECTIONS AND RESPONSES TO INDIVIDUAL REQUESTS**

7 **REQUEST FOR PRODUCTION NO. 1:**

8 Complete copies of copyright registrations and deposit material for each of YOUR ASSERTED
9 WORKS.

10 **RESPONSE TO REQUEST NO. 1:**

11 In addition to and without waiving the general objections set forth above, Plaintiff objects to
12 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
13 Request to the extent that the term "deposit material" is undefined and ambiguous. Plaintiff further
14 objects to this Request to the extent that it calls for documents subject to the attorney-client privilege,
15 work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff
16 objects to this Request on the grounds that such documents are publicly accessible, are equally
17 available to Defendants, or are already in their possession, custody, or control.

18 Subject to and without waiving the general and specific objections stated above, Plaintiff will
19 search for and produce relevant and responsive non-privileged copyright registrations within his
20 possession, custody, or control relating to Plaintiff's ASSERTED WORKS.

21 **REQUEST FOR PRODUCTION NO. 2:**

22 All COMMUNICATIONS between YOU, on the one hand, and the other Plaintiffs or third
23 parties, on the other hand, CONCERNING the ACTION, including but not limited to interviews,
24 statements to the press, and discussions with other authors not a party to the ACTION.

25 **RESPONSE TO REQUEST NO. 2:**

26 In addition to and without waiving the general objections set forth above, Plaintiff objects to
27 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
28 Request to the extent that the term "authors" is vague and ambiguous. Plaintiff objects to this Request

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Counsel for Individual and Representative Plaintiffs and the Proposed Class

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

V.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF LAURA LIPPMAN'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS**

1 and any other applicable rules or laws. Plaintiff will interpret these instructions as not
2 requiring Plaintiff to perform unreasonable searches, not requiring cumulative or
3 duplicative discovery, and not requiring Plaintiff to exceed the obligations set forth in
4 the applicable rules and laws.

- 5 14. In providing these responses and objections and in producing documents, Plaintiff does not
6 waive any ground on which she may object to the use of any response, objection or document in
7 subsequent proceedings.
8 15. Plaintiff's investigation in this Action is ongoing. Plaintiff therefore reserves the right to
9 supplement these responses.

10 **OBJECTIONS AND RESPONSES TO INDIVIDUAL REQUESTS**

11 **REQUEST FOR PRODUCTION NO. 1:**

12 Complete copies of copyright registrations and deposit material for each of YOUR ASSERTED
13 WORKS.

14 **RESPONSE TO REQUEST NO. 1:**

15 In addition to and without waiving the general objections set forth above, Plaintiff objects to
16 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
17 Request to the extent that the term "deposit material" is undefined and ambiguous. Plaintiff further
18 objects to this Request to the extent that it calls for documents subject to the attorney-client privilege,
19 work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff
20 objects to this Request on the grounds that such documents are publicly accessible, are equally
available to Defendants, or are already in their possession, custody, or control.

21 Subject to and without waiving the general and specific objections stated above, Plaintiff will
22 search for and produce relevant and responsive non-privileged copyright registrations within her
23 possession, custody, or control relating to Plaintiff's ASSERTED WORKS.

24 **REQUEST FOR PRODUCTION NO. 2:**

25 All COMMUNICATIONS between YOU, on the one hand, and the other Plaintiffs or third
26 parties, on the other hand, CONCERNING the ACTION, including but not limited to interviews,
27 statements to the press, and discussions with other authors not a party to the ACTION.

Joseph R. Saveri (State Bar No. 130064)
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Christopher K. L. Young (State Bar No. 318371)
Louis A. Kessler (State Bar No. 243703)
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Counsel for Individual and Representative Plaintiffs and the Proposed Class

[Additional counsel on signature page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

V.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Case No. 4:23-cv-06663

**PLAINTIFF SARAH SILVERMAN'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS,
INC.'S FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS**

1 those set forth in the Federal Rules of Civil Procedure, the Local Rules of this Court, and
2 any other applicable rules or laws. Plaintiff will interpret these instructions as not
3 requiring Plaintiff to perform unreasonable searches, not requiring cumulative or
4 duplicative discovery, and not requiring Plaintiff to exceed the obligations set forth in the
5 applicable rules and laws.

- 6 14. In providing these responses and objections and in producing documents, Plaintiff does not
7 waive any ground on which she may object to the use of any response, objection or document in
8 subsequent proceedings.
- 9 15. Plaintiff's investigation in this Action is ongoing. Plaintiff therefore reserves the right to
10 supplement these responses.

OBJECTIONS AND RESPONSES TO INDIVIDUAL REQUESTS

REQUEST FOR PRODUCTION NO. 1:

12 Complete copies of copyright registrations and deposit material for each of YOUR ASSERTED
13 WORKS.

RESPONSE TO REQUEST NO. 1:

15 In addition to and without waiving the general objections set forth above, Plaintiff objects to this
16 Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
17 Request to the extent that the term "deposit material" is undefined and ambiguous. Plaintiff further
18 objects to this Request to the extent that it calls for documents subject to the attorney-client privilege,
19 work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff
20 objects to this Request on the grounds that such documents are publicly accessible, are equally available
21 to Defendant, or are already in their possession, custody, or control.

22 Subject to and without waiving the general and specific objections stated above, Plaintiff will
23 search for and produce relevant and responsive non-privileged copyright registrations within her
24 possession, custody, or control relating to Plaintiff's ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 2:

26 All COMMUNICATIONS between YOU, on the one hand, and the other Plaintiffs or third
27 parties, on the other hand, CONCERNING the ACTION, including but not limited to interviews,
28 statements to the press, and discussions with other authors not a party to the ACTION.

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Counsel for Individual and Representative Plaintiffs and the Proposed Class

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

V.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF RACHEL LOUISE SNYDER'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS**

1 and any other applicable rules or laws. Plaintiff will interpret these instructions as not
 2 requiring Plaintiff to perform unreasonable searches, not requiring cumulative or
 3 duplicative discovery, and not requiring Plaintiff to exceed the obligations set forth in
 4 the applicable rules and laws.

- 5 14. In providing these responses and objections and in producing documents, Plaintiff does not
 6 waive any ground on which she may object to the use of any response, objection or document in
 7 subsequent proceedings.
 8 15. Plaintiff's investigation in this Action is ongoing. Plaintiff therefore reserves the right to
 9 supplement these responses.

OBJECTIONS AND RESPONSES TO INDIVIDUAL REQUESTS

REQUEST FOR PRODUCTION NO. 1:

10 Complete copies of copyright registrations and deposit material for each of YOUR ASSERTED
 11 WORKS.

RESPONSE TO REQUEST NO. 1:

12 In addition to and without waiving the general objections set forth above, Plaintiff objects to
 13 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 14 Request to the extent that the term "deposit material" is undefined and ambiguous. Plaintiff further
 15 objects to this Request to the extent that it calls for documents subject to the attorney-client privilege,
 16 work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff
 17 objects to this Request on the grounds that such documents are publicly accessible, are equally
 18 available to Defendants, or are already in their possession, custody, or control.

19 Subject to and without waiving the general and specific objections stated above, Plaintiff will
 20 search for and produce relevant and responsive non-privileged copyright registrations within her
 21 possession, custody, or control relating to Plaintiff's ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 2:

22 All COMMUNICATIONS between YOU, on the one hand, and the other Plaintiffs or third
 23 parties, on the other hand, CONCERNING the ACTION, including but not limited to interviews,
 24 statements to the press, and discussions with other authors not a party to the ACTION.

1 David A. Straite (admitted *pro hac vice*)
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4 New York, New York 10017
5 Tel.: (646) 933-1000
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8
9 *Counsel for Plaintiffs and the Proposed
10 Class, Additional Counsel Listed Below*

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RICHARD KADREY, SARAH SILVERMAN,
CHRISTOPHER GOLDEN, TA-NEHISI
COATES, JUNOT DÍAZ, ANDREW SEAN
GREER, DAVID HENRY HWANG,
MATTHEW KLAM, LAURA LIPPMAN,
RACHEL LOUISE SNYDER, JACQUELINE
WOODSON, AND LYSA TERKEURST,

Individual and Representative Plaintiffs,
v.

META PLATFORMS, INC.;

Case No. 3:23-cv-03417-VC

**PLAINTIFF LYSA TERKEURST'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS,
INC.'S FIRST SET OF REQUESTS FOR
PRODUCTION**

PROPOUNDING PARTY: Defendant Meta Platforms, Inc.

RESPONDING PARTY: Lysa TerKeurst

SET NUMBER: One (1)

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiff Lysa TerKeurst ("Plaintiff") in the above-titled action hereby responds to Defendant Meta Platforms, Inc. ("Defendant" or "Meta") First Set of Requests for Production of Documents (the "Requests"). An agreement by Plaintiff to search for documents does not mean that she has documents in her possession, custody, or control.

1 requiring cumulative or duplicative discovery, and not requiring Plaintiff to exceed
2 the obligations set forth in the applicable rules and laws.

3 14. In providing these responses and objections and in producing documents, Plaintiff
4 does not waive any ground on which she may object to the use of any response, objection or
5 document in subsequent proceedings.

6 15. Plaintiff's investigation in this Action is ongoing. Plaintiff therefore reserves the
7 right to supplement these responses.

8 **OBJECTIONS AND RESPONSES TO INDIVIDUAL REQUESTS**

9 **REQUEST FOR PRODUCTION NO. 1:**

10 Complete copies of copyright registrations and deposit material for each of YOUR
11 ASSERTED WORKS.

12 **RESPONSE TO REQUEST NO. 1:**

13 In addition to and without waiving the general objections set forth above, Plaintiff objects
14 to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects
15 to this Request to the extent that the term "deposit material" is undefined and ambiguous. Plaintiff
16 further objects to this Request to the extent that it calls for documents subject to the attorney-client
17 privilege, work product doctrine, and/or any other applicable privilege or protection from
18 disclosure. Plaintiff objects to this Request on the grounds that such documents are publicly
19 accessible, are equally available to Defendants, or are already in their possession, custody, or
20 control.

21 Subject to and without waiving the general and specific objections stated above, Plaintiff
22 will search for and produce relevant and responsive non-privileged copyright registrations within
23 her possession, custody, or control relating to Plaintiff's ASSERTED WORKS.

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Counsel for Individual and Representative Plaintiffs and the Proposed Class

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

V.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF JACQUELINE WOODSON'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS**

1 and any other applicable rules or laws. Plaintiff will interpret these instructions as not
 2 requiring Plaintiff to perform unreasonable searches, not requiring cumulative or
 3 duplicative discovery, and not requiring Plaintiff to exceed the obligations set forth in
 4 the applicable rules and laws.

- 5 14. In providing these responses and objections and in producing documents, Plaintiff does not
 6 waive any ground on which she may object to the use of any response, objection or document in
 7 subsequent proceedings.
 8 15. Plaintiff's investigation in this Action is ongoing. Plaintiff therefore reserves the right to
 9 supplement these responses.

OBJECTIONS AND RESPONSES TO INDIVIDUAL REQUESTS

REQUEST FOR PRODUCTION NO. 1:

10 Complete copies of copyright registrations and deposit material for each of YOUR ASSERTED
 11 WORKS.

RESPONSE TO REQUEST NO. 1:

12 In addition to and without waiving the general objections set forth above, Plaintiff objects to
 13 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 14 Request to the extent that the term "deposit material" is undefined and ambiguous. Plaintiff further
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 20 search for and produce relevant and responsive non-privileged copyright registrations within her
 21 possession, custody, or control relating to Plaintiff's ASSERTED WORKS.

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 23 parties, on the other hand, CONCERNING the ACTION, including but not limited to interviews,
 24 statements to the press, and discussions with other authors not a party to the ACTION.